

From: [Barbara Nann](#)
To: [Barbara Aldridge](#)
Cc: [Barbara Aldridge](#); [Dipanjana Bhattacharya](#); [Garyg Miller](#); [Lydia Johnson](#); [Mark Peycke](#); [Susan Roddy](#); [Wren Stenger](#)
Subject: Re: Fw: Gulfco Removal Action AOC Comments
Date: 01/21/2010 10:47 AM

I will need to see the corporate title tree for Chromalloy Amerian Corporation before I can determine whether Sequa or Chromalloy is the proper party.

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▼ [Re: Fw: Gulfco Removal Action AOC Comments](#)

Re: Fw: Gulfco Removal Action AOC Comments 

Barbara Aldridge to: Wren Stenger

01/15/2010
01:35 PM

Cc: Lydia Johnson, Garyg Miller, Barbara Nann, Dipanjana Bhattacharya, Susan Roddy, Barbara Aldridge, Mark Peycke

Wren,

Gary feels that the PRPs have made a good faith effort on this AOC, and most of their changes are reasonable. The biggest issues he had were -- (Gary, pls let me know if I captured this correctly)
-differences in due dates for the final report (EPA wanted 14 days, & they want 45 days "after receipt of all necessary documentation" - too open-ended)
-differences in progress report frequency (EPA wanted every 14 days, they want monthly)

On the plus side, they have suggested a number of efficiencies that will shorten the timeframe needed to complete a removal (i.e., using the work plan already drafted instead of the outline SOW followed by a work plan., and using the RI FS project manager & the QA QC plan, already approved for the RI FS). And they have not asked for some of the things they wanted in the past - ie doing the whole site as a

removal, abbreviated risk assessment, the guarantee of a no action ROD, etc.

On the enforcement side, they left Parker Drilling off the AOC (the group cannot speak on their behalf) and replaced Sequa with Chromalloy. (Sequa is the parent of Chromalloy, who was a prior owner). Legal will need to weigh in on that one.

Barbara J. Aldridge, Enforcement Officer
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▼ Re: Fw: Gulfco Removal Action AOC Comments

Re: Fw: Gulfco Removal Action AOC Comments 

Wren Stenger to: Barbara Aldridge

01/14/2010
04:39 PM

Cc: Lydia Johnson

Ok, let me know big issues once you review. Thanks

▼ Re: Fw: Gulfco Removal Action AOC Comments

Re: Fw: Gulfco Removal Action AOC Comments 

Barbara Aldridge to: Wren Stenger

01/14/2010
01:07 PM

Cc: Lydia Johnson

Wren,

I forwarded you the previous msg to keep you informed, and let you know that the PRPs **did** forward their comments - when we met on 1/5 we didn't know for sure when we would see their mark-up. The team is meeting today at 3p today to discuss, even tho Barbara Nann is out on leave until next Thursday. Gary's first impression on a first glance (we just got this today and it came from the PRP's contractor, NOT directly from Tom M) is that this could work, but it needs a legal look. Gary was going to discuss with Mark P. and ask if he wants to review it or should we wait for BN.

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▼ Re: Fw: Gulfco Removal Action AOC Comments

Re: Fw: Gulfco Removal Action AOC Comments 

Wren to: Barbara Aldridge
Stenger

01/14/2010
12:48 PM

Cc: Lydia Johnson

Are there any issues? If so, what?

▼ Fw: Gulfco Removal Action AOC Comments

Fw: Gulfco Removal Action AOC Comments

Barbara Aldridge to: Wren Stenger, Lydia Johnson

01/14/2010
10:02 AM

Cover letter from Gulfco Group to Mariani on the removal aoc

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----- Forwarded by Barbara Aldridge/R6/USEPA/US on 01/14/2010 10:01 AM -----

Fw: Gulfco Removal Action AOC Comments

Garyg Miller to: Barbara Aldridge, Barbara Nann, Dipanjana Bhattacharya, Susan Roddy

01/14/2010
08:49 AM

Cc: Carlos Sanchez

FYI, the Gulfco PRP Group's cover letter to their markup of the removal AOC.

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----- Forwarded by Garyg Miller/R6/USEPA/US on 01/14/2010 08:47 AM -----

From: "Eric Pastor" <eric.pastor@pbwllc.com>
To: Garyg Miller/R6/USEPA/US@EPA
Date: 01/14/2010 08:40 AM
Subject: Removal Action AOC Comments

Hi Gary –

Per our conversation yesterday, attached is a copy of the Gulfco Group's comments on the removal action AOC as transmitted by Liz Webb to Tom Mariani and Barbara Nann. The comment letter is attached to this e-mail. I will send separate e-mails with a redlined version of the AOC and a clean copy of the AOC with suggested revisions. Please let me know if you have any problems accessing these documents or do not receive all three e-mails.

Thanks.

Eric Pastor
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[attachment "1-12-10 Removal Action AOC comment letter.pdf" deleted
by Wren Stenger/R6/USEPA/US]